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VIA ECF

Judge Jennifer L. Rochon
 United States District Court
 Southern District of New York
 500 Pearl Street, Rm 1920
 New York, NY 10007

Re: *Katrina Martin v. New American Cinema Group, Inc. et al*
1:2022-cv-05982-MKV-JLR

Dear Judge Rochon:

Plaintiff Katrina Martin (“Plaintiff”), with the consent of Defendants, respectfully submits this letter requesting a 30-day extension of all remaining discovery deadlines pursuant to Rule 1(F) of Your Honor’s Individual Rules of Practice. The original deadlines and corresponding extended deadlines are outlined in the table below. This is the parties’ first joint request for an extension of time. A proposed Revised Civil Case Management Plan and Scheduling Order is attached hereto.

Discovery Task	Current Deadline	Extended Deadline
Initial ROGs and RFAs to be served	February 7, 2023	March 9, 2023
Depositions to be complete	March 7, 2023	April 6, 2023
End of Fact Discovery	March 7, 2023	April 6, 2023
Plaintiff’s Expert Disclosures	March 21, 2023	April 20, 2023
Defendant’s Expert Disclosures	March 28, 2023	April 27, 2023
All Expert Discovery Completed	April 21, 2023	May 22, 2023

We thank the Court for its time and consideration in this matter.

Respectfully submitted,

/s/ Erik Dykema

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Attorneys for Plaintiff